

**ABATE & PREUSS  
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**APPLICATION GRANTED**

Oc **SO ORDERED**

**VERNON S. BRODERICK**

**U.S.D.J.** 10/25/2023

*[Handwritten signature of Vernon S. Broderick]*  
Defendant to provide Pretrial Services with the date  
and time he will attend the event and proof of purchase  
of the tickets prior to the event.

**VIA ECF**

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: Request for a One-Day Bail Modification**  
*United States v. Angel Montanez, 23 Cr. 306 (VSB)*

Dear Judge Broderick:

Angel Montanez, charged with one count of Felon in Possession of a Firearm in violation of 18 U.S.C.922(G), is currently on pretrial release subject to the following conditions: Travel restricted to SDNY/EDNY; Surrender travel documents and no new applications; Pretrial supervision as directed by Pretrial Services; Drug testing and treatment; Mental health evaluation and treatment; Home detention; Location monitoring technology; Deft to continue or seek employment.

Mr. Montanez respectfully requests permission to attend a Halloween festival with his wife and children. It's called the Great Jack O'Lantern Blaze, and it is an after-dark Halloween experience in Old Bethpage, New York. Here is the link to the event:  
<https://pumpkinblaze.org/blaze-long-island.html#calendar>

Because he is on home detention, Mr. Montanez's Pretrial Services Officer, Jonathan Lettieri, is not inclined to allow him to attend this event, even though it is within Mr. Montanez's travel restrictions (Eastern District of New York) and is only a two hour event. The government defers to Pretrial Services on this matter.

Counsel respectfully requests that Mr. Montanez be permitted to take his family to this Halloween event in Long Island. He has been fully compliant with all his conditions of bail. He is working. He attends mental health treatment as required, as well as drug testing. While he was arrested by the United States Marshals in June of this year, he had been attending state court in this case for several months before. Additionally, he is on location monitoring equipment, so that his location will be monitored at the event as well.

If permitted, Mr. Montanez will attend the two-hour event, leaving his house at approximately 7:00 p.m. (it starts at 8:00 p.m.), and be back home by approximately 11:00 p.m. Thank you.

Sincerely,

*Camille M. Abate*  
Camille M. Abate, Esq.

cc: T. Josiah Pertz (via ECF)